

# **Exhibit J**

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: APPLE IPHONE  
ANTI-TRUST LITIGATION

AND RELATED ACTIONS. ) Civil Action No.  
) 4:11-cv-06715YGR  
)  
)

HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

DEPOSITION OF:

C.K. HAUN, VOLUME I  
WEDNESDAY, JANUARY 13, 2021  
9:00 A.M.

Reported by: GINA M. CLOUD  
CSR No. 6315

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Deposition of C.K. HAUN, the witness, taken  
on behalf of the Plaintiffs, on Wednesday, January  
13, 2021, at 9:00 a.m., via Virtual Zoom, pursuant  
to NOTICE.

APPEARANCES OF COUNSEL:

FOR PLAINTIFF EPIC GAMES, INC:

CRAVATH SWAINE & MOORE

BY: BRENT BYARS, ESQ.

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FOR APPLE AND THE WITNESS:

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FOR CONSUMER CLASS PLAINTIFFS:

WOLF HALDENSTEIN ADLER FREEMAN & HERZ  
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1 APPEARANCES: (CONTINUED)

2  
3 FOR THE DEVELOPER CLASS:

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BY: EAMON KELLY, ESQ.

5 MARTIN AMARO, ESQ.

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7 (312) 641-3200

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8  
9 ALSO PRESENT:

10 Kiego Painter, Videographer

Matthew Riesdorph

11 Judah Weinerman

Jennifer Fine, Esq.

12 Stephanie Brown, Esq.

[illegible]

[illegible]

24 Q. What do you enjoy about providing developer  
25 technical support?

1 intended for use by any third-party application who  
2 uses them within the criteria of the documentation,  
3 our guidelines and the program license agreement.

4 Private APIs are application interfaces in  
5 the operating system that are not available for  
6 third-party use.

7 Q. Do third-party developers know of the  
8 existence of the private APIs?

9 A. I do not know if all third parties are aware  
10 of a particular private API.

11 Q. Can you give me an example of a particular  
12 private API just in application?

13 A. Would you like the specific name or would  
14 you like a characterization of what it may do?

15 Q. A characterization is fine.

16 A. Our graphics subsystem relays on designating  
17 certain portions of the screen on a customer's device  
18 into areas that we call views.

19 At a very high level, you can consider them  
20 rectangles that cover the entire screen and each  
21 rectangle may be drawn differently or be interacted  
22 with by the user in different methodologies.

23 Third-party developers have public APIs  
24 which allow them to define, create, manipulate, draw  
25 into and move views on an iOS device screen.

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[REDACTED]

7 Q. How does a developer know, third-party  
8 developer, is it able to use the private APIs?

9 A. No.

10 Q. So how is that relevant to a review of the  
11 application?

12 A. The use of private APIs is prohibited by the  
13 Apple Developer Program license agreement and The App  
14 Review Guidelines; [REDACTED]

[REDACTED]

[REDACTED]



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1 A. Correct.

2 Q. How does an iOS device recognize an app  
3 that it can launch?

4 A. How technical do you want to get into this?

5 Q. Let's start functionally and then we'll  
6 drill down.

[REDACTED]

[illegible]

Row	Bar Length (approx. % of total width)
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4	100
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6	30
7	95
8	100
9	100
10	25

[illegible]

**\_\_\_\_\_**

18 Q. Other than the App Store and other than the  
19 enterprise program, are there other ways that an iOS  
20 app can be loaded onto -- launched -- are there  
21 other sources by which an iOS app can get -- native  
22 iOS app can get to a phone?

23	A. Yes.
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

9 Q. Can we pull up tab 18. And this will be --  
10 I'll give you the Exhibit Number. It takes a little  
11 bit to come over to you. This will be Exhibit 130.

12 (The document referred to was marked as  
13 Exhibit 130 for identification and is attached  
14 hereto.)

15 BY MR. KELLY:

16 Q. We'll wait until you get that on your  
17 screen.

18 A. And I see it and I'm opening it. Yes, I see  
19 this e-mail.

20 Q. Mr. Haun, you recognize Exhibit 130 as an  
21 e-mail you sent to the group of individuals in  
22 November of 2015 with the subject [REDACTED]

24 Do you see that?

25 A. Yes.

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1

Q. In this e-mail you stated: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

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[REDACTED]

11 Q. We referred to private APIs that Apple has;  
12 do you remember that?

13 A. Yes.

14 Q. What is a private API?

15 A. A private API is a connection point to  
16 system functionality which is not available to a  
17 third-party developer.

18 Q. What are the reasons Apple would choose to  
19 make those APIs not available to third-party  
20 developers?

[REDACTED]



[illegible]



[illegible]

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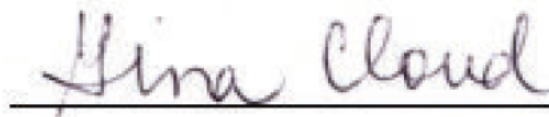
1 I, GINA M. CLOUD, a certified shorthand  
2 reporter for the State of California, do hereby  
3 certify:

4 that prior to being examined, the  
5 witness named in the foregoing deposition, was by me  
6 duly sworn to testify the truth, the whole truth,  
7 and nothing but the truth pursuant to Section No.  
8 2093 of the Code of Civil Procedure;

9 That said deposition was taken before  
10 me pursuant to notice, at the time and place therein  
11 set forth, and was taken down by me in shorthand and  
12 thereafter reduced to typewriting via computer-aided  
13 transcription under my direction;

14 I further certify that I am neither  
15 counsel for, nor related to, any party to said  
16 action, nor in anywise interested in the outcome  
17 thereof.

18 IN WITNESS WHEREOF, I have hereunto  
19 subscribed my name this 14th day of January,  
20 2021.

21  
22   
23

GINA M. CLOUD

CSR No. 6315

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**\*\* HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER \*\***

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

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**IN RE APPLE iPHONE ANTITRUST  
LITIGATION**

)  
)  
) Civil Action No.  
) 4:11-cv-06715YGR  
)  
)

**ZOOM VIDEOTAPED DEPOSITION OF C.K. HAUN  
VOLUME II**

**Palo Alto, California  
Thursday, January 14, 2021**

**Reported by:**

**LORI M. BARKLEY, CSR No. 6426**

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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IN RE APPLE iPHONE ANTITRUST ) Civil Action No.  
LITIGATION ) 4:11-cv-06715YGR

Zoom Videotaped deposition of C.K. HAUN,  
Volume II, taken on behalf, at Palo Alto, California,  
beginning at 9:08 a.m., and ending at 11:41 a.m., on  
Thursday, January 14, 2021, before LORI M. BARKLEY,  
Certified Shorthand Reporter No. 6426.

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1 APPEARANCES:

2  
3 FOR PURE SWEAT BASKETBALL AND THE APP DEVELOPER CLASS  
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HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

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1 APPEARANCES (CONTINUED) :

2  
3 FOR PLAINTIFF EPIC GAMES, INC.:

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6 BY: M. BRENT BYARS

7 BY: MONICA COSCIA

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1 APPEARANCES (CONTINUED) :

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3 FOR CONSUMER CLASS PLAINTIFFS :

4 WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP

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7 BY: JUDAH WEIDERMAN

8 Attorneys at Law

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10 New York, New York 10016

11 rifkin@whafh.com

12

13

14 Also present:

15 Curt Norris, Videographer

16 Jennifer Brown; Stephanie Fine (Apple)

17

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2	A. Yes.
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[REDACTED]

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1 STATE OF CALIFORNIA ) ss.  
2 COUNTY OF LOS ANGELES )  
3

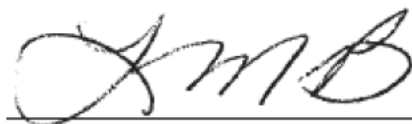
4 I, Lori M. Barkley, CSR No. 6426, do hereby  
5 certify:

6 That the foregoing deposition testimony  
7 taken before me at the time and place therein set  
8 forth and at which time the witness was administered  
9 the oath;

10 That the testimony of the witness and all  
11 objections made by counsel at the time of the  
12 examination were recorded stenographically by me, and  
13 were thereafter transcribed under my direction and  
14 supervision, and that the foregoing pages contain a  
15 full, true and accurate record of all proceedings and  
16 testimony to the best of my skill and ability.

17 I further certify that I am neither counsel  
18 for any party to said action, nor am I related to any  
19 party to said action, nor am I in any way interested  
20 in the outcome thereof.

21 IN WITNESS WHEREOF, I have subscribed my  
22 name this 14th day of January, 2021.

23   
24

25 LORI M. BARKLEY, CSR No. 6426